



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590  
JUN 27 2014

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7009 1680 0000 7669 1901**  
**RETURN RECEIPT REQUESTED**

Mr. Gus Rios  
Quala Services, LLC  
803 East 120<sup>th</sup> Street  
Chicago, Illinois 60628

Re: Notice of Violation  
Quala Services, LLC  
EPA ID. No.: ILD 984 808 022

Dear Mr. Rios:

On June 28, 2013 a representative of the U.S. Environmental Protection Agency inspected Quala Services, LLC (Quala) located in Chicago, Illinois. The purpose of the inspection was to evaluate Quala's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) and its implementing regulations; specifically, those regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference.


Based on EPA's June 28, 2013 inspection, which included personal observations and a review of records and information provided by Quala, EPA finds that Quala violated the following requirement of the Illinois Administrative Code (IAC):

A large quantity generator of hazardous waste who ships hazardous waste offsite for treatment, storage or disposal must submit an Annual Report to the Illinois Environmental Protection Agency (Illinois EPA) by March 1<sup>st</sup> for generator activities for the previous year. The report must contain hazardous waste numbers and quantities for each hazardous waste shipped offsite. See, 35 IAC § 722.141(a)(5). The 2010 Annual Report submitted by Quala to the Illinois EPA did not include all the hazardous waste numbers for hazardous waste shipped offsite during the 2010 calendar year. Specifically, hazardous waste manifests filled out by Quala for hazardous waste sent offsite during the 2010 calendar year included hazardous waste numbers: D001, D002, D007, D016, F001, F002, F003, and F004. However, only hazardous waste number D001 was included in the 2010 Annual Report.

According to Section 3008(a) of the RCRA, EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than 30 days after receipt of this letter documenting the actions, if any, Quala has taken since the inspection to establish compliance with the above requirement.

You should submit your response to Graciela Scambiaterra, U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Scambiaterra, of my staff, at (312) 353-5103.

Sincerely,

  
R/V Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Todd. Marvel, Illinois Environmental Protection Agency (Todd.Marvel@Illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
LAND AND CHEMICALS DIVISION, RCRA BRANCH  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Quala Services, LLC

EPA ID No.: ILD 984 808 022

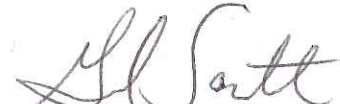
LOCATION ADDRESS: 803 East 120<sup>th</sup> Street  
Chicago, Illinois 60628

NAICS CODE(s): 48849

DATE OF INSPECTION: June 28, 2013

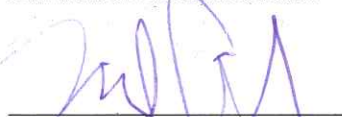
U.S. EPA INSPECTOR(s): Graciela Scambiatterra

PREPARED BY:

  
Graciela Scambiatterra  
Environmental Scientist

June 4, 2014  
Date

REVIEWED BY:

  
Michael Cunningham Chief  
Compliance Section 1  
RCRA Branch  
Land and Chemicals Division

6/18/14  
Date

## **RCRA Compliance Evaluation Inspection**

### **Introduction**

I, Graciela Scambiaterra, Environmental Scientist, from the United States Environmental Protection Agency (EPA) conducted a hazardous waste compliance evaluation inspection (CEI) at Quala Services, LLC (Quala), located at 803 East 120<sup>th</sup> Street, Chicago, Illinois. The Purpose of the CEI was to evaluate Quala's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations related to the management and disposal of hazardous waste.

Photos taken during the inspection are attached.

### **History and Interview**

I arrived at Quala on June 28, 2013 at approximately 9:15 am at the shipping/receiving part of the facility. I was then directed to the main office area which was down the street. I arrived at the main office area, identified myself and provided my credentials to the Quala receptionist. She contacted Gus Rios, Assistant Operations Manager, who arrived in the office area at approximately 9:45 a.m. I interviewed Mr. Rios, during the inspection. The following individuals were present during the CEI:

<b>NAME</b>	<b>TITLE</b>	<b>EMPLOYER</b>
Gracie Scambiaterra	Environmental Scientist	U.S. EPA
Gus Rios	Assistant Operations Manager	Quala
Jorge Navarro	Regional Environmental, Health and Safety Specialist	Quala

Mr. Rios escorted me to the office area where I held an opening conference. Mr. Rios informed me that Matt Potts, Operations Manager for Quala, normally handles the environmental duties at the facility, but was on bereavement leave. While I prepared for the CEI, Mr. Rios needed to handle a few facility issues and stepped away for approximately 15 minutes. When he returned, he informed me that Quala had a Regional Environmental, Health and Safety Specialist, Jorge Navarro that could assist with the CEI.

We phoned Mr. Navarro at approximately 10:00 a.m. and I held the opening conference with Mr. Rios in the office and Mr. Navarro on the phone. I explained to them the purpose for being at the facility and that I would be performing a records review and a physical site inspection of the facility, including taking photographs. Our discussion included confidential business information (CBI). I informed them that if they or any other Quala employee were going to disclose any CBI, I should be informed immediately in order for me to handle that material and/or information in accordance with EPA policy. Mr. Navarro then informed me that he Mr. Rios could continue with the remaining

opening conference while he (Mr. Navarro) drove to the facility. I also agreed to start the records review portion of the CEI first in order to give Mr. Navarro time to get to the facility.

Mr. Rios and I then continued with the opening conference. He provided a brief history of the facility. Quala has been operating at this location since January 2011 when they purchased the facility from PSC Container Services, LLC. PSC Container Services, LLC had been operating at this location since approximately 1990. Quala has approximately 33 employees and operates Monday through Saturday. Monday through Friday Quala operated 24hrs, and 7:00 a.m. until 3:30 p.m. on Saturday.

Quala is a tank truck and IBC (intermediate bulk container) washing service. Basically, tank trucks and IBCs come to the facility for their interior to be washed. These tanks and IBCs come to Quala with residual material, which is immediately drained and then collected as waste, some of which is hazardous. Quala then conducts interior washing of these tanks and containers. This washing process causes a generated waste, of which some are hazardous. According to Mr. Rios, Quala does not wash trucks or containers that carry PCBs or Isocyanides.

According to the RCRAInfo database, Quala is a large quantity generator (LQG) of hazardous waste.

I provided the Small Business Resources Guide and the Illinois Pollution Prevention (P2) Guidance to Mr. Rios.

### **Records Review**

#### **Training**

Mr. Rios provided me the training records for years 2010 through 2012. I was also informed that the 2013 RCRA training was scheduled for August 2013.

Mr. Navarro provided me a RCRA Training Matrix outline to review which detailed the content of the training program. The following topics were included:

1. Introduction to regulations
2. Solid and hazardous waste determination
3. Generator requirements, including the Contingency Plan.
4. Facility residual program and tracking
5. Department of transportation requirements

The following individuals were trained:

- 2012: Training (40 CFR 265.16) provided by Phillip A. Paradise, Jr. on 6/20/12
- Gus Rios
  - Juan Armenta
  - Carlos Rodriguez

- Tasha Herrera

2011: Training (40 CFR 265.16) provided by Charles D. Boyd on 4/13/11

- Gus Rios
- Juan Armenta
- Tasha Herrera (on 9/29/11)

2010: Training (40 CFR 265.16) provided by Charles D. Boyd on 6/23/10

- Gus Rios
- Harry Miller Jr.
- Julio Echeverria (left employment on 4/29/11)
- Jeffrey Noble (on 7/23/10)

I also reviewed the individual training records for the two trainers above:

- Phillip A. Paradise, Jr. – training (40 CFR 265.16) on 10/11/12 given by The WCM Group, Inc., Humble, Texas.
- Charles D. Boyd – various hazardous waste management training certificates dating back to 1990.

#### Hazardous Waste Determinations

I asked Mr. Rios for the waste determinations for their tank washings and IBC washings waste. He informed me that Quala conducts their waste determinations based on user knowledge, bill of lading, Material Safety Data Sheets (MSDSs) and/or the waste manifests of the waste that were previously in the containers and tanks that their washing. I reviewed the original waste manifest during my review of Quala's generated hazardous waste manifest review (see below).

#### Annual Reports

Hazardous Waste Annual Report							
Calendar Year:		2012		Date Signed:		2/26/2013	
Certified Mail Receipt: electronic							
Waste Numbers/Codes Reported							
D001	D004	D008	F002	U007	D002	U154	
Treatment, Storage, and Disposal Facilities Used:							
Form TI				MID021087275			
Form TI				MAD039322250			
Form GM				MID980615298			
Form GM				ARD069748192			
Form GM				OHD000816629			

Hazardous Waste Annual Report									
Calendar Year:				2011		Date Signed:		Unknown	
Certified Mail Receipt: electronic									
Waste Numbers/Codes Reported									
D001	D004	D008	F002	U007					
D002	U092								
Treatment, Storage, and Disposal Facilities Used:									
Form TI					MID021087275				
Form TI					MAD039322250				
Form GM					MID980615298				
Form GM					ARD069748192				
Form GM					OHD000816629				

Hazardous Waste Annual Report									
Calendar Year:				2010		Date Signed:		2/28/11	
Certified Mail Receipt: unknown									
Waste Numbers/Codes Reported									
D002									
Treatment, Storage, and Disposal Facilities Used:									
Form G					MID980615298				
Form TI					MID021087275				

At approximately 12:25 p.m., we took a break for lunch and I departed the facility.

I returned to Quala at approximately 1:15 p.m. and continued with the records review.

### Contingency Plan

Mr. Rios provided me the Quala Contingency Plan, titled "Preparedness, Prevention, and Contingency (PPC) Plan for my review. The plan was revised on 11/14/11.

Quala's PPC Plan lists Gus Rios as the Primary Emergency Coordinator, and Juan Armenta as the Alternate Emergency Coordinator.

The PPC Plan also contained the following:

1. Emergency Equipment list
2. Inspection and monitoring of equipment
3. Evacuation Plan
4. Emergency Contacts directory and arrangements made with local emergency response agencies and hospitals

Manifests/LDRs

I asked Mr. Rios for Quala's hazardous waste manifests for calendar years 2010, 2011 and 2012. He provided the following for my review:

Hazardous Waste Manifests					
Manifest Number	Waste Number(s)/Code(s)	Quantity	Date	TSDF Signature	Gen. Sign
006480733 JJK	D001/D002	4,180 gal	3/12/10	Yes	Harry Miller Jr.
007294376 JJK	D001/D002	2,035 lbs	5/25/10	Yes	Harry Miller Jr.
007695669JJK	D001	1,485 gal	7/20/10	Yes	Harry Miller Jr.
007740032 JJK	D001	440 gal	8/9/10	Yes	Gus Rios
007739946 JJK	D001/F001/F002/ F003/ F004/ D002	1,155 gal	10/12/10	Yes	Gus Rios
007855456 JJK	D001/D007/F003/ D016	1,155 gal	11/23/10	Yes	Julio Echeverria
007739465 JJK	D001	935 gal	01/17/11	Yes	Julio Echeverria
008502842 JJK	D016/D001	1,555 gal	4/11/11	Yes	Julio Echeverria
004709646 FLE	D002	525 gal	5/25/11	Yes	Juan Armenta
004709647 FLE	D001/D004	1,515 gal	5/25/11	Yes	Juan Armenta
004731991 FLE	D001	935 gal	7/20/11	Yes	Juan Armenta
004791974 FLE	D001	770 gal	9/21/11	Yes	Juan Armenta
004792303 FLE	D001/D008/F002	880 Gal	10/19/11	Yes	Juan Armenta
004868117 FLE	D001/D002	550 gal	11/16/11	Yes	Juan Armenta
009226933 JJK	D001	900 lbs	11/21/11	Yes	Juan Armenta
004893606 FLE	D001/F001	1,650 gal	1/11/12	Yes	Juan Armenta
005231536 FLE	D001/D002	55 gal	2/27/12	Yes	Juan Armenta
005215910 FLE	D001/D002	220 gal	3/14/12	Yes	Juan Armenta
005216054 FLE	D001	1,295 gal	4/18/12	Yes	Juan Armenta
005216324 FLE	D001	660 gal	5/16/12	Yes	Juan Armenta
005612110 FLE	D001/D002	1,220 gal	6/13/12	Yes	Carlos Rodriguez



005552965 FLE	D001	1,265 gal	8/23/12	Yes	Carlos Rodriguez
006194627 FLE	D001	2,145 gal	9/26/12	Yes	Carlos Rodriguez
006194852 FLE	D001	1,375 gal	10/17/12	Yes	Carlos Rodriguez
006194853 FLE	D001	165 gal	10/17/12	Yes	Carlos Rodriguez
010733716 JJK	F005	1,760 gal	11/9/12	Yes	Carlos Rodriguez
010741330 JJK	F005	4,635 gal	12/3/12	Yes	Carlos Rodriguez
010743307 JJK	D001/D018/F003/ F005	990 gal	12/17/12	Yes	Gus Rios
010124330 JJK	D001/D018/F003/ F005	2,798 gal	12/10/12	Yes	Tasha Herrera

I concluded the Quala records review at approximately 2:55 p.m. and prepared for the physical site inspection of the facility.

### Site Inspection

The Quala site inspection began at the approximately 3:00 p.m. at the Tank Truck Wash Bay area. This area contains seven wash bays. Mr. Rios explained the truck residual collections process. Here, trucks arrive and are depressurized. The tank trucks are then checked for residuals. Mr. Rios informed me that each bay has an empty 5-gallon bucket/container with a plastic liner that is used to collect the contents of residual waste from the tank trucks. Once filled, these 5-gallon containers are temporarily placed in a collection area between wash bays number seven and eight throughout the day. A waste determination will be made of the residual waste within 24-hrs of being collected, according to Mr. Rios. If the residual waste from the trucks is determined to be hazardous, these 5-gallon containers are then brought to the satellite accumulation area between wash bays two and three where they are accumulated in 55-gallon containers until the total waste accumulated reaches 55-gallons. We walked in and around the seven wash bay areas and Mr. Rios showed me the satellite accumulation area (*see photo 1*). I observed two 55-gallon containers with the words "hazardous waste" in this area. Mr. Rios informed me that the container on the left contained liquid hazardous waste (residual liquid from the tank trucks) and the container on the right contained empty plastic liners from the 5-gallon buckets. We also walked over to the 5-gallon temporary collection area between wash bays number seven and eight (*see photo 2*). No residual waste was in the collection area awaiting a waste determination at the time of the inspection.

Once the residual waste collection process is completed, the tank trucks undergo the washing process. Only the interior of the tank truck is washed/rinsed. Each wash bay has a trench system which is connected to an onsite wastewater treatment system (WWTS). The trenches collect the wash/rinse wastewater and then send them to the onsite WWTS.

The WWTS consists of two 125,000-gallon capacity wastewater treatment tanks for the onsite treatment of non-hazardous waste.

At this time, we walked across a parking lot to another building called the IBC Department/building. Here, the intermediate bulk containers go the same residual collection process as the tank trucks. The only difference is the IBCs are collected directly into a 55-gallon container and the waste determination is made prior to the collection process. A waste determination is necessary prior to the collection process as more than one IBC will be collected in a 55-gallon container. Waste residuals are segregated based on hazardous and non-hazardous waste. The wash rack area is where the IBCs are washed/rinsed internally. There is also a wet area where the IBCs are washed/rinsed externally. All rinse wastewaters are sent to the onsite WWTS for treatment.

The 90-day storage area is located within the IBC Department. Here, Quala was storing 15 55-gallon containers of waste, of which nine were hazardous (*see photo 3*). All the hazardous waste containers were labeled with the words "Hazardous Waste" and dated within 90-days of their accumulation start dates.

The Quala site inspection was completed at approximately 3:40 p.m., at which time Mr. Rios and Mr. Navarro escorted me back to the office area so I could conduct the closing conference.

### **Closing Conference**

Once we returned to the office area, I reviewed my notes and sat down with Mr. Rios and Mr. Navarro to discuss the records review and the site inspection. The following items were discussed:

- Annual Report/Manifest discrepancy: we discussed that the hazardous waste manifests for waste sent offsite during year 2010 shows more hazardous waste numbers/codes than what was reported in the 2010 Annual Report that was submitted on 2/28/2011. Specifically, the hazardous waste manifests show a total of eight different waste numbers/codes throughout the year (D001, D002, D007, D016, F001, F002, F003, and F004) but only one (D001) was reported in the annual report. Mr. Rios and Mr. Navarro informed me that they would look into the discrepancy.

I thanked Mr. Rios and Mr. Navarro for their time and explained to them that a compliance determination would occur once a thorough a review was completed.

I completed the CEI at approximately 4:15 p.m. and departed the facility.

**ATTACHMENTS: (2)**

Attachment 1	Photographs taken during the inspection
Attachment 2	Inspection checklist



**Photo 1:** Photographer: G. Scambiaterra. Date/Time: 6/28/2013/3:16 p.m.  
Description: Satellite containers of hazardous waste between Bays 2 and 3. Left container is of hazardous waste liquids and the right container held hazardous waste solids.



**Photo 2:** Photographer: G. Scambiaterra. Date/Time: 6/28/2013/3:21 p.m.  
Description: Collection area for 5-gallon buckets used to collect residual waste from incoming empty tanker trucks located between Bays 7 and 8. At the time of the inspection, there were no buckets in use.





**Photo 3:** Photographer: G. Scambiaterra. Date/Time: 6/28/2013/3:35 p.m.  
Description: 90-day storage area with hazardous and non-hazardous waste containers.

Installation Name:  
Quala Services, LLC  
Date of Inspection:  
June 28, 2013

Location Address:  
803 E. 120<sup>th</sup> Street, Chicago, IL 60628  
U.S. EPA Inspector:  
Graciela Scambiaterra

EPA ID Number:  
ILD 984 808 022

## Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
	<b>Section 722.111 Hazardous Waste Determination</b>	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>Section 722.112 USEPA Identification Numbers</b>	
722.112(a)	Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a) 722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
	<b>Section 722.120 General Requirements</b>	
722.120(a)	Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
	<b>Section 722.121 Acquisition of Manifests</b>	
722.121(a)	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(d) 722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
	<b>Section 722.122 Number of Copies</b>	
722.122	Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
	<b>Section 722.123 Use of the Manifest</b>	
722.123(a)	For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	<p>has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.123(c)
722.130	<p><b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b></p> <p>Is there any hazardous waste ready for transport off-site?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If so, is the generator complying with the pre-transport requirements in Subpart C?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.130
(722.134(a))	<p><b>Section 722.134 Accumulation Time</b></p> <p>Has the generator complied with the following requirements?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(722.134(a)(1))	<p>A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>and/or</p> <p>B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>and/or</p> <p>C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>and/or</p> <p>D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(722.134(a)(2))	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(722.134(a)(3))	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(722.134(a)(4))	<p>Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:</p> <p>Does the facility accumulate hazardous waste in containers?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If "No", go to Subpart J.</p>	
(725.211) (725.214)	<p><b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b></p> <p>Has the generator closed an accumulation area?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.211 725.214



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**U.S. EPA Inspector:**  
Graciela Scambiaterra

**EPA ID Number:**  
ILD 984 808 022

## Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> COMMENTS:	
(725.278)	<b>Section 725.278 Air Emission Standards</b> Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Comments: Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <b>Note:</b> If "No", go to Subpart C.	
	<b>SUBPART J: TANK SYSTEMS</b>	
	Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.211
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.214

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes _____ No _____ N/A <u>✓</u></p> <p><b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	
(725.291(a))	<p>For tanks <b>existing</b> prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A <u>✓</u></p>	
(725.291(b))	<p>Does this assessment consider at least the following:</p> <p>1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A <u>✓</u></p> <p>2) hazardous characteristics of the wastes? Yes _____ No _____ N/A <u>✓</u></p> <p>3) existing corrosion protection measures? Yes _____ No _____ N/A <u>✓</u></p> <p>4) documented age of the tank system? Yes _____ No _____ N/A <u>✓</u></p> <p>5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A <u>✓</u></p> <p>*IRPE = Independent Registered Professional Engineer</p>	
(725.291(c))	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A <u>✓</u></p> <p><b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	

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(725.292(a))	<p>For <b>new</b> tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>Does the assessment include, at a minimum, the following:</p> <p>1) design standards for tanks and ancillary equipment?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>2) hazardous characteristics of the waste(s) to be handled?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave?</p> <p>Yes _____ No _____ N/A <u>✓</u></p>	
(725.292(g))	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)?</p> <p>Yes _____ No _____ N/A <u>✓</u></p>	
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>or</p> <p>if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?</p> <p>Yes _____ No _____ N/A <u>✓</u></p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?</p> <p>Yes _____ No _____ N/A <u>✓</u></p>	

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(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) Are welded flanges, joints and connections inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	

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(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A <u>✓</u>	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes _____ No _____ N/A <u>✓</u> 2) overfill prevention controls? Yes _____ No _____ N/A <u>✓</u> 3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A <u>✓</u>	
(725.294(c))	<b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes _____ No _____ N/A <u>✓</u> 2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No _____ N/A <u>✓</u> 3) data from monitoring equipment? Yes _____ No _____ N/A <u>✓</u> 4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No _____ N/A <u>✓</u>	
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A <u>✓</u>	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes _____ No _____ N/A <u>✓</u>	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A <u>✓</u> b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A <u>✓</u> c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A <u>✓</u>	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A <u>✓</u> d3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A <u>✓</u> <b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	

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(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A <u>✓</u></p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A <u>✓</u></p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A <u>✓</u></p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A <u>✓</u></p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A <u>✓</u></p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A <u>✓</u></p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> <li>- the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A <u>✓</u></li> <li>- Section 725.117(b) is complied with? Yes _____ No _____ N/A <u>✓</u></li> </ul> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A <u>✓</u></p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A <u>✓</u></p>	

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(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A <u>✓</u>	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A <u>✓</u>  If "No", skip to Section 725.300.  Is Section 725.117(b) being complied with? Yes _____ No _____ N/A <u>✓</u>  Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A <u>✓</u>  COMMENTS:	
(725.302)	<b>Section 725.302 Air Emission Standards</b> Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <u>✓</u>  Comments:	
(725.131)	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b>  Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <u>✓</u> No _____ N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <u>✓</u> No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes <u>✓</u> No _____ N/A _____ c) portable fire extinguishers, fire control equipment/spill control equipment and decontamination equipment? Yes <u>✓</u> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes <u>✓</u> No _____ N/A _____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <u>✓</u> No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <u>✓</u> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <u>✓</u> No _____ N/A _____	
(725.135)	Is the facility maintaining adequate aisle space? Yes <u>✓</u> No _____ N/A _____	

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(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> <li>- arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.151(a))	<p><b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b></p> <p>Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "No", skip to Section 725.155.</p> <p>Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.151(b))	<p>Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	
(725.152(a))	<p>Does the plan describe the actions required for response to:</p> <ul style="list-style-type: none"> <li>- fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> <li>- police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> <li>- description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul> <p>Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> <li>- an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	



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(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <p>a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) submitted to:</p> <p>- police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>b) the plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>c) the facility changes in a way that modifies the emergency response necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) information regarding emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>e) information regarding equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If the facility has had a release, explain in detail.</p>	

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**U.S. EPA Inspector:**  
Graciela Scambiaterra

**EPA ID Number:**  
ILD 984 808 022

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p><b>Section 725.116 Personnel Training</b> Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ol>	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	<p><b>Section 728.107 Waste Analysis and Recordkeeping</b> Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
722.134(c)	<p><b>Section 722.134 Satellite Accumulation</b> Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If there are more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
722.134(g)	<p><b>Note:</b> A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.</p>	
	<p><b>SUBPART D: RECORDKEEPING AND REPORTING</b></p>	
722.140(a)	<p><b>Section 722.140 Recordkeeping</b> Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(a)
722.140(b)	<p>Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(b)
722.140(c)	<p>Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(c)
722.140(d)	<p>Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.140(d)

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(a)	<b>Section 722.141 Annual Reporting</b> Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	2010 Report Deficient 722.141(a) See Report.
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	2010 Report Deficient 722.141(b)
722.142(a)(1)	<b>Section 722.142 Exception Reporting</b> If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
722.150	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b> Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.150
722.160	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b> Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.160
722.170	<b>SUBPART G: FARMERS</b> Is the generator a farmer? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.170